

212048  
119173

---

# BY THE U.S. GENERAL ACCOUNTING OFFICE

## Report To The Secretary Of The Interior

---

### Interior's Minerals Management Programs Need Consolidation To Improve Accountability And Control

The division of responsibilities between the Bureau of Land Management and the Minerals Management Service for managing Federal fuel and non-fuel mineral resource programs weakens accountability and control of the programs. Furthermore, minerals management programs are fragmented within the Bureau of Land Management, whose primary goal is surface land management.

As major sources of Federal receipts and domestic supplies of fuel and non-fuel minerals, these programs require but are lacking clear lines of authority and organization for efficient operations and program review. However, the Minerals Management Service was established specifically to improve management, oversight, and accountability for Federal minerals resources and has the potential to provide comprehensive management of these resources.

GAO recommends that the Secretary of the Interior consolidate the Department's minerals management programs in the Minerals Management Service.



119173

GAO/EMD-82-104  
JULY 27, 1982

023066

**Request for copies of GAO reports should be sent to:**

**U.S. General Accounting Office  
Document Handling and Information  
Services Facility  
P.O. Box 6015  
Gaithersburg, Md. 20760**

**Telephone (202) 275-6241**

**The first five copies of individual reports are free of charge. Additional copies of bound audit reports are \$3.25 each. Additional copies of unbound report (i.e., letter reports) and most other publications are \$1.00 each. There will be a 25% discount on all orders for 100 or more copies mailed to a single address. Sales orders must be prepaid on a cash, check, or money order basis. Check should be made out to the "Superintendent of Documents".**



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

ENERGY AND MINERALS  
DIVISION

B-206970

The Honorable James G. Watt  
The Secretary of the Interior

Dear Mr. Secretary:

This letter concludes our examination of the Department of the Interior's organizational structure for Federal energy and mineral resource management. In the past, we have touched on many specific aspects of the problems posed by the split of minerals management responsibilities among multiple Assistant Secretaries and bureaus, and this review draws from past as well as current analysis.

We conclude that accountability and management of minerals programs are weakened by the current split of responsibilities between the Bureau of Land Management and Minerals Management Service. To facilitate efficient, comprehensive management of these resources and to clarify lines of authority and accountability, we recommend that, to the extent permitted by law, you consolidate the Department's onshore minerals management responsibilities in the Minerals Management Service.

The national importance of Federal energy and mineral resources is reflected in their role as sources of Federal revenues and domestic supply. Receipts from these resources provided approximately \$11 billion in FY 1981 and are projected to double by the 1990's. For some non-fuel minerals, the Federal government owns the majority if not all domestic resources. The 822 million acres of Federal mineral rights ownership has long been foreseen as the most promising future source of both fuel and non-fuel minerals.

BACKGROUND

The question of the best organizational structure for managing Federal energy and mineral resources has been debated for decades. The Hoover Commission considered this question in the broader context of a Department of Natural Resources in 1950. In 1970, the Public Land Law Review Commission report, One Third of the Nation's Land, included recommendations for greater consolidation of Department of the Interior mineral authorities, specifically calling for single-agency management for the Outer Continental Shelf leasing program. Furthermore, the Commission recommended consolidated budgets for public land programs to show the relationship between costs and benefits of each program.

(008466)

The fiscal importance of Federal energy and mineral resource programs was most recently recognized in the report of your own Commission on Fiscal Accountability of the Nation's Energy Resources and related congressional hearings. These programs are the largest non-tax source of receipts to the Federal Treasury as well as being critical sources of national supply of many mineral commodities.

Since 1959, GAO reports have touched on various aspects of the fragmented organizational structure for energy and minerals management at the Department of the Interior. Originally, from a financial management standpoint, in December 1959 1/, we recommended consolidating revenue accounting responsibilities in the U.S. Geological Survey (in what became the Minerals Management Service). Again, in 1979 and 1981, 2/ we recommended increasing management attention to the financial management problems we had identified with royalty accounting.

More recently, we have begun directly addressing the question of an overall organizational structure for minerals management, going beyond strictly financial management aspects. In our June 5, 1981, report "Minerals Management at the Department of the Interior Needs Coordination and Organization" (EMD-81-53), we were critical of the Department's inability to consider the minerals policy implications of land use, environmental, and other types of decisions. We concluded that the fundamental problems were the lack of consistent or cumulative program evaluation and fragmented minerals management responsibilities which obscured accountability and weakened management control.

In that report, we recommended that you develop a minerals management program plan which would include criteria and standards of accountability for you and the Congress to measure the performance of the Government's minerals management. In addition, we recommended that you also evaluate the need to consolidate or otherwise coordinate the Department of the Interior mineral resource management responsibilities to allow such program planning.

With establishment of the Minerals Management Service in January 1982 and requirement for a nearly year-long review of the

---

1/"Review of Supervision of Oil and Gas Operations and Production on Government and Indian Lands by Geological Survey, Department of the Interior, November 1958," Report to the Congress of the United States, December 1959.

2/"Oil and Gas Royalty Collections--Serious Financial Management Problems Need Congressional Attention," (FCMSD-79-24, April 13, 1979) and "Oil and Gas Royalty Collections--Longstanding Problems Costing Millions," (AFMD-82-6, October 29, 1981).

permanent disposition of minerals management and oversight functions, important facets of our earlier recommendations were addressed. Consolidation of the Outer Continental Shelf leasing responsibilities in May 1982 further indicated your responsiveness not only to GAO but to such earlier analyses as the Public Land Law Review Commission report as well as internal studies made through the years.

#### SCOPE, METHODOLOGY, AND OBJECTIVES

We undertook this overall organizational review with the express interest of the Chairmen of the Mines and Mining and Oversight and Investigations Subcommittees of the House Committee on Interior and Insular Affairs. At a joint hearing of these subcommittees, in December 1981, we testified on the organizational arrangements for minerals revenue accounting and budgeting at the Department of the Interior, and the Chairmen then asked us to continue evaluating minerals management problems associated with fragmented delegations of authority. The subcommittees expressing interest agreed that it would be appropriate to send the report directly to the Secretary of the Interior to facilitate his decisionmaking at the earliest possible date.

The objective of our review was to examine the following two central issues:

- (1) Are energy and mineral resource management programs organized to facilitate accountability of decisionmakers/managers who affect revenues?
- (2) Are costs, receipts, and budget requirements reported completely, accurately, and in a format conducive to public and congressional review of these Federal resource revenue-generating activities?

We examined these issues from an organizational standpoint. We specifically questioned how the fragmented energy and minerals resource management responsibilities, principally between the Bureau of Land Management (BLM) and the Minerals Management Service (MMS), weakened management control and accountability.

Our methodology consisted of interviewing Federal minerals management officials; analyzing relevant organizational and programmatic documents and reports for consistency, thoroughness, and accuracy; and updating prior reports and analyses of Federal minerals management organizational structure and Department of the Interior legislative authorities. Our review conformed to GAO's current "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions."

We concentrated our efforts on the Department's onshore energy and minerals leasing program, given the fact that the offshore program has already been consolidated. As appropriate, however, we drew parallels between offshore and onshore programs. Also, we addressed fragmented responsibilities for administration of the General Mining Laws by updating prior reports and drawing from recent Departmental correspondence.

A list of GAO reports from which we drew information, analysis, and an historical review is presented in Appendix I. We updated information as necessary and re-analyzed a number of these reports cumulatively and from a Secretarial, program-management viewpoint. Also, we evaluated inter-bureau coordination problems at headquarters and in field offices, particularly analyzing the ability of the Department's minerals managers to perform cost-benefit analyses. Our field work included Colorado, New Mexico, and Wyoming because of their key roles in minerals management, revenue-generation and revenue-management; New Mexico and Wyoming alone are the sources of approximately two-thirds of onshore Federal energy and mineral resource revenues and BLM and MMS have centralized revenue accounting functions in Colorado.

#### FRAGMENTED RESPONSIBILITIES WEAKEN ACCOUNTABILITY

The Department does not have a management structure which facilitates consistent goal-setting or measurement of results for minerals programs. The lines of responsibility for these programs are fragmented between BLM and MMS, and the fact that funds for minerals management are parts of two separate budget accounts complicates program review and weakens accountability. The only common point for management review of minerals programs is at or above the Under Secretary's level.

Our discussions with minerals managers in BLM and MMS indicated their general agreement that many benefits may be derived from consolidating responsibilities now divided between the two. These benefits ranged from improved financial management to a better fit between information analysis and decisionmaking. However, there are divergent views on where and how such a consolidation could occur. Furthermore, within both organizational elements, evaluations of the benefits of and recommendations for such a consolidation have been proposed to the responsible Assistant Secretaries. The primary problems such a reorganization would entail, according to some agency officials, appear to be potential personnel unrest, the administrative problem of how to coordinate or transfer land status records, and provision for effective support of land use planning. However, none of these problems seem insurmountable.

Mineral leasing onshore

The Mineral Leasing Act of 1920, as amended, provides the basic authority for the Department of Interior to issue leases, collect revenues, and regulate development of certain federally owned mineral resources. These authorities have been delegated to two separate organizational elements by Secretarial Order 2948. BLM is responsible for long-range planning and administration of leases before development starts, and MMS is responsible for supervision of development on leases. We found that this delegation of authority presents problems both at departmental and field levels. It does not adequately address the interdependence of many functions and, in fact, complicates program management.

While BLM is dependent on MMS for support of lease issuance and pre-production functions, MMS is dependent on BLM for support of such post-lease activities as accounting for collections from leases. In order to determine whether full and accurate royalty payments have been made, MMS must have correct ownership and interest information for each lease, and the order assigns BLM as the agency of record for this information. An official of the Royalty Management Division of MMS told us that the questionable accuracy of lease interest records may hamper efforts to verify the accuracy of royalty accounts. We discussed problems with BLM's land and lease status records in two prior reports. 1/ In both of these reports, we pointed out the large backlogs of lease applications, and the most recent report specifically addresses the large backlog of assignments pending approval. Furthermore, we discussed the critical nature of this lease interest information to improving royalty accounting in two other recent reports in our continuing evaluation of the royalty accounting system at MMS. 2/

Federal coal management

Problems at the departmental level are best illustrated in the management of Federal coal resources. The Federal Coal Leasing Amendments Act of 1975 (FCLAA) gave the Department of the Interior an extensive role in prescribing where, when, and

---

1/"Actions Needed to Increase Federal Onshore Oil and Gas Exploration and Development," (EMD-81-49, February 11, 1981) and "Accelerated Onshore Oil and Gas Leasing May Not Occur As Quickly As Anticipated," (EMD-82-34, February 8, 1982).

2/"Oil and Gas Royalty Collections--Longstanding Problems Costing Millions," (AFMD-82-6, October 29, 1981) and "Oil and Gas Royalty Accounting--Improvements Have Been Initiated But Continued Emphasis Is Needed To Ensure Success," (AFMD-82-55, April 27, 1982).

how exploration and development for Federal coal resources will occur. The Federal coal "program" is the most extensively legislated, heavily funded, and complex of the onshore leasing programs.

A minimum of four Interior bureaus--BLM, Geological Survey, Office of Surface Mining, and MMS--play a role and request funds for managing Federal coal resources. The memorandum of understanding to sort out these various roles for three bureaus, before MMS was created, was 45 pages long, and has not been updated to include MMS. Moreover, it does not assign one of these bureaus the role of setting overall program goals or monitoring program costs and results.

In the past, we have reported on the kinds of wasteful activities which can result when interdependent functions are poorly coordinated. In "Mapping Problems May Undermine Plans for New Federal Coal Leasing" (EMD-81-30, December 12, 1980), we evaluated the uselessness of a multi-million dollar coal resource mapping effort by the division of the Geological Survey which became MMS. This activity was not guided by and, in the end, did not meet the needs of the decisionmaker, BLM. Again, in "How Interior Should Handle Congressionally Authorized Coal Lease Exchanges" (EMD-81-87, August 6, 1981) we criticized the lack of coordination of information provided by USGS (MMS) and BLM decisionmaking.

Our most recent evaluation of decisionmaking for coal leasing indicates that burdensome multiple layers of review add unproductive time. A BLM coal program official told us and we confirmed that on the average it takes three months for management review of coal decisionmaking documents. Because there is no single line of authority, these documents are reviewed in the organizational elements of each Assistant Secretary who has a share of program management.

In fact, we believe that Federal coal management is not directed by a program at all. It lacks the essential characteristics to produce management control or to achieve efficiency and effectiveness of operations:

- Costs and related benefits associated with the "program" are scattered throughout the Department. Some program-specific costs are virtually unidentifiable, and an accurate accounting or reliable review of program effectiveness cannot be performed.
- The annual report submitted to the Congress to meet requirements of Section 8 of FCLAA reflects the inability of the Department to perform meaningful program evaluation due to lack of basic measurement criteria or standards. The reports, to date, have been descriptions of activities without analysis, discussion of costs and related benefits, or recommendations for management improvements.

--A clear line of authority and related accountability for management of coal resources cannot be identified. The players are so numerous and their roles so intertwined that no single organization, and certainly no single manager, can be held strictly accountable.

--Efforts such as streamlining to increase management efficiencies require inter-bureau task forces and are not part of routine program management.

A coal "program" official agrees that the type of cost/benefit analysis which would measure program effectiveness or focus attention on efficiency is not now possible.

#### Field-level problems

In contrast to these department-level management problems, the split responsibilities for onshore oil and gas leasing activities of BLM and MMS reveal field-level problems. Leasing of onshore oil and gas is accomplished with a more limited, cheaper Federal role than with coal. The split in responsibilities is ostensibly pre-production jurisdiction for BLM and post-production for MMS. Secretarial Order 2948 delegates these responsibilities, and a multitude of memoranda of understanding have further complicated these relationships. A recent evaluation by MMS of memoranda of understanding found that of 78 currently valid agreements, 35 are with ELM.

Despite the apparent clarity of Secretarial Order 2948 and the extensive effort to sort out responsibilities and authorities, we found evidence of coordination problems, inability to resolve some conflicts at the working level, and duplications. This is illustrated in the situation we found in the state of New Mexico.

A problem area pointed out to us by both BLM and MMS officials involves the difficulty of coordinating resource evaluations with leasing decisions. Planning workloads to avoid delays, unnecessary appeals and law suits and to optimize receipts is made difficult by separate priority-setting and planning systems. On one hand, a BLM planning document for the New Mexico State Office noted the need to develop a policy regarding issuing leases noncompetitively when MMS does not provide a report on whether or not the application is in a competitive leasing area quickly enough to meet current ELM plans to expedite lease issuance. The document noted that the Washington BLM office "informally says go ahead and lease noncompetitively, recognizing substantial receipts are being lost." On the other hand, the responsible MMS resource evaluation official pointed out the difficulty of planning for changing workloads for BLM, given that pre-lease evaluations are only one source of requirements.

Disputes over surface use plans for leases have led to involvement of the Interior Solicitor's office. In one case, a Solicitor's opinion was requested, and the resulting opinion stressed the need for cooperation and mutual notification between BLM and MMS. Another Solicitor's opinion on the division of responsibility on lease activities was required after BLM collected a trespass fine from an operator which MMS felt was unjustified. These disputes demonstrate that despite the existence of Secretarial Order 2948, the two agencies do not have a clear idea of what their responsibilities are.

Both agencies are charged by the Secretary with pursuing the minerals management goal of environmental protection, and we believe the dual responsibility underlies the disputes cited above. MMS and BLM both have environmental protection staff--one for operations supervision and enforcement and the other for permit approvals. This is a duplication of effort. The Roswell MMS Oil and Gas District Office we visited has three environmental scientists and the BLM District Office has five surface reclamation specialists on its minerals staff. Officials of both offices admit that these eight individuals all perform similar functions and that though they attempt to coordinate, they are often unable to schedule joint inspections to present a single Federal position to the operators.

We found that similar conditions exist in other states. A 1979 USGS (MMS) memorandum to BLM's Wyoming State Director stated that proposed delegation of some of USGS (MMS) authority on oil and gas drill pads would "reduce duplication of effort and excessive correspondence" between BLM and USGS (MMS). We noted that it would not eliminate time spent in mediating disputes and discussed this view with Wyoming MMS and BLM minerals officials, who believe that the Roswell case is not unique.

SPLIT RESPONSIBILITIES DO NOT  
FACILITATE GOAL ACHIEVEMENT

Division of the Department's minerals management responsibilities among multiple bureaus, in addition to contributing to the inefficiencies discussed above, hampers achievement of national goals for exploration and development of Federal energy and mineral resources. As expressed in Interior policy documents, these goals include the following:

- orderly and timely development;
- environmental protection; and
- receipt of fair market value.

Organizational goals

The role of BLM as administrator of minerals management in relationship to its role as a surface management agency remains unclear to us. BLM minerals disposition authorities are administered in conjunction with its land use planning authorities prescribed by the Federal Land Policy and Management Act of 1976 (FLPMA). FLPMA addresses the Bureau's goals as a surface management agency and prescribes the renewable resource conservation principles of multiple-use and sustained-yield as guidance. However, BLM's minerals management responsibilities are distinct from its land use planning duties under FLPMA.

The Bureau has wrestled with its dual role, trying to address the goals of minerals management with a surface management orientation, apparently by periodically studying resultant conflicts and elevating minerals management organizationally. The reasons stated last year for creation of a Deputy Director of BLM for Energy and Mineral Resources are the same reasons given five years earlier for elevating minerals management to the Assistant Director level.

We do not believe that a Deputy Director or even a Director of BLM for energy and minerals will ever finally resolve the conflicts inherent in trying to manage subsurface, nonrenewable resources in support of surface, renewable resource principles and goals. We believe that the conflicts which arise between the goals of the minerals management laws and other laws are conflicts of national policy and must be addressed at the national level.

ELM's mineral management organization

Furthermore, ELM's minerals management organization is itself fragmented. The Land and Resources appropriation funds 35 BLM programs, 11 of which are minerals-related. These 11 programs, in turn, are split between two Deputy Directors--one for Lands and Renewable Resources and the other for Energy and Minerals.

We believe this division of authorities obscures accountability for the Bureau's minerals management. The relationships of these two organizational elements are unclear and confusing.

Under the Deputy Director for Lands and Renewable Resources, the Division of Lands administers adjudication of minerals cases and issuance of leases along with other Bureau resource allocations and disposals. On the other hand, the Deputy Director for Energy and Minerals is the line authority for management of all energy and mineral resources.

Also, though the Departmental Manual identifies these Deputy Directors and subordinate Assistant Directors as line officials, the Bureau's organization chart and field directorate descriptions indicate that the line of authority for implementation of all Bureau programs is from the Director to State Directors and then district and resource area managers.

We discussed the inability of EIM to adequately manage its renewable resources in a prior report, "Changes in Public Land Management Required to Achieve Congressional Expectations," (CED-80-82, July 16, 1980). We particularly noted the budgetary emphasis on certain Bureau resource programs over others. Mineral resources receive such emphasis. Our recommendation in that report--that the Bureau's responsibilities and funds be better aligned--complements our conclusion in this review that, within BLM, minerals management programs compete with renewable resource programs for budget and management attention.

### Minerals program decisionmaking

In the absence of clearly identified and operational minerals program goals, decisions affecting supplies and revenues from these resources are made inconsistently. Such matters as the amount of filing fees for noncompetitive oil and gas leases are elevated for secretarial decision whereas far-reaching land use decisions are routinely made at the lowest organizational levels.

As we found in the past, the lack of overall national goals for minerals decisionmaking leads to local decisions based on local desires without analysis of the national implications. We reported to the Chairman of the Mines and Mining Subcommittee of the House Interior and Insular Affairs Committee in a letter dated September 10, 1981, ("Subject: Improvements in Department of the Interior Leasing of Potential Aluminum Resources are Necessary for More Timely Decisionmaking," EMD-81-135), about the unassessed, cumulative effects of local "no leasing" decisions. Opportunities to explore and develop a potential domestic aluminum resource were delayed or foregone completely by poor decisions and lack of monitoring for cumulative results.

Our review of the departmental objectives and priorities promulgated in the management-by-objective system and budget priority guidance further demonstrates this difficulty of achieving program goals. Both Assistant Secretaries with minerals management authorities--Land and Water Resources as well as Energy and Minerals--must meet minerals management objectives. Both officials must streamline or accelerate leasing; neither official can fully meet a number of his objectives without full compliance from the other.

For example, the Assistant Secretary for Energy and Minerals must develop a national minerals policy. A major component of such a policy, as was revealed in the Department's response to the requirement of the National Materials and Minerals Policy, Research and Development Act of 1980 (PL 96-479), is Federal minerals management, but the question of which Assistant Secretary will prescribe policy to and monitor the compliance of the other is an obvious problem. Furthermore, how the Assistant Secretary for Land and Water Resources will meet the objective to "streamline onshore and offshore energy and mineral resources leasing programs," without the Assistant Secretary for Energy and Minerals making that a priority objective also is a problem. Energy and Minerals organizationally controls not only the post-production portion of the leasing programs, it performs such critical functions as determination of competitive leasing areas and provision of technical information for pre-production lease decisionmaking.

Not only departmental management objectives but policy and budget priorities for the FY 1983 budget reveal a lack of focus for Federal energy and minerals management. While recreation, wildlife, water, and grazing (renewable) resources have single points of direction, energy and mineral resource priorities were directed, with the exception of royalty accounting, to both ELM and the Geological Survey. The proposed Departmental budget for FY 1983, contained, for the first time, an introductory summary of energy leasing programs.

As we testified in December, 1981, the fact that funds for energy and mineral leasing are parts of two separate budget accounts complicates program review. Consolidated review and priority-setting for the budgets of these programs are apparently still not routine matters.

Our attempts to analyze program costs and related benefits, mentioned earlier regarding the coal program, revealed that such analyses cannot be reliably done at present. We still believe that this is particularly undesirable for programs having such a critical role in Federal receipt generation and domestic minerals supply.

#### Organizational objectives of BLM and MMS

Within the past year, ELM has undertaken a number of organizational changes, internal studies, procedural reviews, personnel and training revisions, and other efforts. These changes, studies, and reorganizations have primarily been directed at improving the Bureau's responsiveness to the goals of Federal energy and minerals

management. 1/ A review of the history of ELM's attempts to improve its performance in this area leads us to believe that the underlying causes of its problems are (1) its dependence on, without control of, other organizations, particularly MMS, for the minerals information for decisionmaking; (2) its primary responsibility as a surface management agency; and (3) its decentralized, state-oriented organizational structure with its attendant difficulty in dealing with national issues.

Since the January 19, 1982, transfer of functions previously performed by the Geological Survey's Conservation Division to form the nucleus of the Minerals Management Service, the final mission and functions of this new organization have remained indeterminate. However, the purpose for which it was created--to improve management, oversight, and accountability for minerals--and the recent consolidation of offshore leasing in MMS indicate its potential as the Federal minerals manager.

The primary impetus for establishing MMS was the need to address lost revenues from theft and undercollection of royalties. A larger aspect of the lost revenue problem is the question of determining and collecting fair market value for Federal mineral resources. Secretarial Order 2948 assigns this responsibility regarding leasable minerals to the organizational element which became MMS, but ELM has recognized how fundamental this issue is to its minerals management responsibilities by making this a function of its new Division of Geology and Mineral Assessment. This duplication strikes at the heart of the problems now confronting both bureaus: Who is accountable for meeting the goals, especially the goal of fair market value return, of Federal minerals management laws?

The complexity of the functions of determining and collecting the fair market value for minerals resources, the close relationship of these functions to those of royalty and production management, and the expertise and data of MMS are strong arguments for retaining these functions in the Service. Similar functions of determining values of locatable and salable minerals require the same types of expertise and present the same complex management questions.

---

1/We reviewed the offshore and onshore streamlining efforts in "Pitfalls in Interior's New Accelerated Offshore Leasing Program Require Attention," (EMD-82-26, December 18, 1981), and "Accelerated Onshore Oil and Gas Leasing May Not Occur As Quickly As Anticipated," (EMD-82-34, February 8, 1982).

CONCLUSIONS

We conclude that split responsibilities for management of Federal mineral resources programs between ELM and MMS weaken accountability and program management control. Furthermore, mineral management programs are fragmented within ELM, making routine program cost and results monitoring difficult. As major sources of Federal receipts and domestic supplies of fuel and non-fuel minerals, these resource management programs require but are lacking clear lines of responsibility and organization for efficient operations and program review. Established as a focal point for improving management, oversight, and accountability for Federal minerals resources, however, MMS has the potential to provide comprehensive management of these resources.

RECOMMENDATION

We recommend that you consolidate all onshore minerals management responsibilities into the Minerals Management Service to the extent permitted by law. To alleviate potential staffing, funding, and administrative problems associated with such reorganizations, we draw your attention to our report entitled "Implementation: The Missing Link in Planning Reorganizations" (GGD-81-57, March 20, 1981). Although this report deals with reorganizations requiring Presidential and congressional authorization, which we recognize is not the case here, it contains valuable insight into the importance of laying preliminary groundwork to facilitate a timely and successful reorganization.

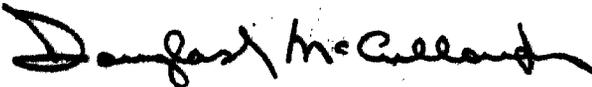
Prior to furnishing the report to you, we briefed your Assistant Secretary for Policy, Budget, and Administration on our conclusions and recommendations. Should you or other Department officials wish to be briefed on the matters in this report, we would be happy to provide such briefings.

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of the Federal agency receiving our recommendations to submit a written statement on actions taken on the recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report. A similar statement must be provided to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Chairmen of the Subcommittees on Mines and Mining and Oversight and Investigations of the House Committee on Interior and Insular Affairs as well as other appropriate congressional committees. We are

also sending copies to your Inspector General; Assistant Secretaries, Energy and Minerals, Land and Water Resources, and Policy, Budget and Administration; and other interested officials. We will make additional copies available upon request.

Sincerely yours,

*for*   
J. Dexter Feach  
Director

GAO REPORTS ON FEDERAL  
MINERALS MANAGEMENT ISSUES

"Review of Supervision of Oil and Gas Operations and Production on Government and Indian Lands by Geological Survey, Department of the Interior," Report to the Congress of the United States, December 1959.

"Role of Federal Coal Resources In Meeting National Energy Goals Needs to be Determined and the Leasings Process Improved," RED-76-79, April 1, 1976.

"Need to Develop a National Non-Fuel Mineral Policy," RED-76-86, July 2, 1976.

"National Energy Policy: An Agenda For Analysis," EMD-77-16, January 27, 1977.

"Inaccurate Estimates of Western Coal Reserves Should Be Corrected," EMD-78-32, July 11, 1978.

"Interior Programs for Assessing Mineral Resources on Federal Lands Need Improvements and Acceleration," EMD-78-83, July 27, 1978.

"Mining Law Reform and Balanced Resource Management," EMD-78-93, February 27, 1979.

"Onshore Oil and Gas Leasing--Who Wins The Lottery?" EMD-79-41, April 13, 1979.

"Oil and Gas Royalty Collections--Serious Financial Management Problems Need Congressional Attention," FGMSD-79-24, April 13, 1979.

"Learning to Look Ahead: The Need for a National Materials Policy and Planning Process," EMD-79-30, April 19, 1979.

"Coal Trespass In the Eastern States--More Federal Oversight Needed," EMD-79-69, May 25, 1979.

"Federal Leasing Policy--Is the Split Responsibility Working?" EMD-79-60, June 4, 1979.

"Policy Needed To Guide Natural Gas Regulation On Federal Lands," EMD-78-86, June 15, 1979.

"Issues Facing The Future of Coal Leasing," EMD-79-47, June 25, 1979.

"Legal and Administrative Obstacles to Extracting Other Minerals From Oil Shale," EMD-79-65, September 5, 1979.

"How to Speed Development of Geothermal Energy on Federal Lands," EMD-80-13, October 26, 1979.

"The U.S. Mining and Mineral-Processing Industry: An Analysis of Trends and Implications," ID-80-04, October 31, 1979.

"Impact of Making the Onshore Oil and Gas Leasing System More Competitive," EMD-80-60, March 14, 1980.

"Changes In Public Land Management Required to Achieve Congressional Expectations," CED-80-80, July 16, 1980.

"A Shortfall in Leasing Coal From Federal Lands: What Effect On National Energy Goals?" EMD-80-87, August 22, 1980.

"Mapping Problems May Undermine Plans For New Federal Coal Leasing," EMD-81-44, January 21, 1981.

"Actions Needed to Increase Federal Oil and Gas Exploration and Development," EMD-81-40, February 11, 1981.

"Minerals Management At The Department of the Interior Needs Coordination and Organization," EMD-81-53, June 5, 1981.

"How Interior Should Handle Congressionally Authorized Federal Coal Lease Exchanges," EMD-81-87, August 6, 1981.

"Simplifying The Federal Coal Management Program," EMD-81-109, August 20, 1981.

"Improvements In Department of the Interior Leasing of Potential Aluminum Resources Are Necessary For More Timely Decisionmaking," EMD-81-135, September 10, 1981.

"Mining on National Park Service Lands--What Is At Stake?" EMD-81-119, September 24, 1981.

"Oil and Gas Royalty Collections--Longstanding Problems Costing Millions," AFMD-82-6, October 29, 1981.

"Accelerated Onshore Oil and Gas Leasing May Not Occur As Quickly As Anticipated," EMD-82-34, February 8, 1982.

"Oil And Gas Royalty Accounting--Improvements Have Been Initiated But Continued Emphasis Is Needed To Ensure Success," AFMD-82-55, April 27, 1982.

(008466)



2274  
93

**AN EQUAL OPPORTUNITY EMPLOYER**

**UNITED STATES  
GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548**

**OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300**

**POSTAGE AND FEES PAID  
U. S. GENERAL ACCOUNTING OFFICE**



**THIRD CLASS**